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PACIFIC ENERGY POLICY CENTER-4539 Lee Avenue La Mesa, California

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Pacific Energy Policy Center Comments on Draft California Water Plan Update 2005

Dear Mr. Dabbs:

The Pacific Energy Policy Center (PEPC) appreciates this opportunity to comment on the Public Review Draft of the California Water Plan Update 2005 (Update 2005). PEPC understands that the California Water Plan (Plan) provides "a framework for water managers, legislators, and the public to consider options and make decisions regarding California's water future."

PEPC Comments on Plan Update 2005

- 1. PEPC endorses the DWR's emphasis on identifying more regional and local water resource issues and promoting integrated and coordinated regional water management. PEPC representatives have worked closely with the San Diego County Water Authority and other San Diego region water districts and agencies to help coordinate regional water resource and related energy planning efforts.
- 2. We are concerned that Update 2005 fails to fully recognize the magnitude of the West's dire water supply and reliability situation during the current and subsequent multi-year droughts. We urge the state to more fully integrate water demand management strategies in its long term resource plans. The cheapest acre-foot of water is the one we never use.
- 3. We urge DWR to participate fully in upcoming inter-basin planning related to sharing reduced Colorado River water supplies in drought situations. We urge that that planning process include specific steps each state commits to undertaking to reduce its peak and baseload water demand during drought periods, including limiting further sprawl development into hotter climate zones within each state, which is constantly driving up water demand throughout the west.

- 4. PEPC believes that Update 2005 overemphasizes new capital projects focused on further construction and expansion of the state's water storage and delivery system infrastructure, instead of focusing more resources on reducing statewide peak and baseload demand for water through conservation and increased local beneficial reuse of reclaimed and purified wastewater, and desalinization. More emphasis on water conservation and reuse would reduce or eliminate the substantial new costs associated with construction of any more dams, reservoirs, aqueducts and pipelines, even where such proposed new construction projects might survive environmental and regulatory review. Update 2005 should commit the state to supporting more regional and local projects to enhance water conservation and beneficial reuse in order to enhance system reliability statewide.
- 5. Update 2005 correctly identifies, but underemphasizes the need for increased regional and local water conservation and reuse among its key water resource management strategies. Local efforts to conserve and reuse limited imported water must continue to be implemented and expanded in order to ensure a more secure water future for our growing and dynamic state.
- 6. The Plan should be refined to further address the growing negative impacts that sprawl development into the hotter portions of California is having on long range water resource planning, and consider steps the state legislature can take to limit this sprawl development in order to enable DWR to retain its ability to provide water to all California residents. An old planners saying is that "When you're in a hole, stop digging". California, due increased population, and the increasing demand for limited Colorado river from upriver states, is already in a very deep water resource planning hole, and sprawl development into hotter climate zones throughout the state is constantly digging the hole even deeper.
- 7. The Plan should outline a proactive state response to significant emerging threats to our water supply and delivery system, including limited energy supplies, increasing climate change, groundwater pollution, and lingering public resistance to utilization of safely reclaimed and purified wastewater, to name a few of the emerging issues that need to be addressed.
- 8. The Plan does not pay enough attention to growing degradation problems facing the Sacramento-San Joaquin Delta water transportation and delivery system. The Delta is becoming more vulnerable to constant overuse, and cannot be expected to safely continue carrying water south without suffering disastrous physical and environmental problems. The Delta's increasing problems (oxidizing soils, decreasing levee stability, significant earthquake threat, and increasing sea level), and its growing ecological problems (fish population losses, invasive species impacts) demand immediate solutions, including serious consideration of decreasing water flows through the Delta over time.

We sincerely appreciate this opportunity to comments on the draft Plan, and all the hard work of DWR staff during the Update 2005 drafting process. We look forward continuing to work with the state on future California Water Plan updates. We look forward to working with DWR and other stakeholders to help reduce statewide demand for imported water while creating new safe, energy efficient and environmentally friendly locally produced water resources.

Sincerely,

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